

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

FULTON DISCOUNT LIQUORS, INC

551 N. Fulton Avenue
Baltimore, Maryland, 21223

Plaintiff,

v.

**THE HARTFORD FINANCIAL SERVICES
GROUP, INC.**

One Hartford Plaza
Hartford, Connecticut, 06115

And

SENTINEL INSURANCE COMPANY, LTD.

One Hartford Plaza
Hartford, Connecticut, 06115

Defendants.

* * * * *

DEFENDANTS' NOTICE OF REMOVAL

Defendants, The Hartford Financial Services Group, Inc. ("Hartford Financial") and Sentinel Insurance Company, Ltd., ("Sentinel"), through counsel, and pursuant to 28 U.S.C. §§ 1441 and 1446 and FED. R. CIV. P. 81(c), hereby file this Notice of Removal from the Circuit Court for Baltimore City to the United States District Court for the District of Maryland, Northern Division, and in support thereof state as follows:

1. Plaintiff initiated the present action against Defendants alleging breach of contract in the Circuit Court for Baltimore City, Case No. 24-C-19-002806, on May 7, 2019. Sentinel and Hartford Financial were served via the MIA Commissioner on June 11, 2019. Sentinel was also served by certified mail on June 17, 2019.

2. Pursuant to 28 U.S.C. §1446(b)(1), this notice is being filed within 30 days of receipt of Plaintiff's initial pleadings.

3. At all relevant times, Fulton Discount Liquors, Inc. was and is a company organized and existing under the laws of the State of Maryland, with its principal place of business located in Baltimore City, Maryland.

4. At all relevant times, Sentinel Insurance Company, Ltd. was and is a corporation organized and existing under the laws of the State of Connecticut, having its principal place of business located in Hartford, Connecticut.

5. Hartford Financial Services Group was and is a corporation organized and existing under the laws of the State of Delaware, having its principal place of business located in Hartford, Connecticut.¹

6. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332. There is true diversity of citizenship, and the amount in controversy exceeds \$75,000, exclusive of costs and interest.

7. A copy of the Complaint filed in the Circuit Court and the subsequently issued Summonses are attached hereto as Exhibit A.

8. Defendants will file and serve responsive pleadings to the Complaint as required by the Federal Rules.

9. A true and correct copy of the Notice of Filing Notice of Removal, which has been filed in the Maryland Circuit Court Action contemporaneously herewith, is attached as Exhibit B.

¹"The Hartford Financial Services Group, Inc." is not a properly named Defendant, as it is not an insurance company and did not issue the insurance policy at issue in this case. By filing this Notice of Removal, The Hartford Financial Services Group, Inc. in no way concedes or admits it is the properly named Defendant in this case, and no waiver or estoppel is intended nor should be inferred.

Respectfully submitted,

/s/ Jessica E. Pak

George E. Reede (#08220)

Jessica E. Pak (#19728)

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(410) 783-6300 (Phone)

(410) 783-6363 (Facsimile)

Counsel for Defendants

CERTIFICATE OF SERVICE

I CERTIFY that on July 2, 2019, a copy of this Notice of Removal to the United States District Court for the District of Maryland (Northern Division) was served via first class mail, postage prepaid on:

Christopher M. Finke
SUNG & HWANG, LLP
9256 Bendix Road, Ste. 109
Columbia, MD 21045
Counsel for Plaintiff

/s/ Jessica E. Pak

Jessica E. Pak